

**Marie-Ann Greenberg, MAG-1284**  
**Marie-Ann Greenberg, Standing Trustee**  
**30 TWO BRIDGES ROAD**  
**SUITE 330**  
**FAIRFIELD, NJ 07004-1550**  
**973-227-2840**  
**Chapter 13 Standing Trustee**

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**UNITED STATES BANKRUPTCY COURT**  
**DISTRICT OF NEW JERSEY**

IN RE:  
GORDON L NELSON

**Case No.: 16-28891RG**

**HEARING DATE: Not Yet Scheduled**

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**TRUSTEE'S LIMITED OBJECTION TO DEBTOR(S) MOTION TO APPROVE LOAN MODIFICATION**

Marie-Ann Greenberg, the Chapter 13 Standing Trustee by way of limited objection to the Debtor(s) Motion to Approve Loan Modification, respectfully objects as follows:

- The debtor was making adequate protection payments pursuant to the Loss Mitigation Order entered on November 2, 2016 of roughly \$2,089.00 per month. This loan modification requires mortgage payments of \$2,570.24 per month without any information as to how this \$481.24 per month increase will be feasible to the debtor.
- The Trustee requests current stubs from all sources of income of the debtor as well as an up to date budget (amended schedule I and J) in advance of the return date of this motion.

It is for this reason and any others the Court deems fit that the Motion to Approve Loan Modification should be denied.

Dated: January 22, 2018

By: /S/Marie-Ann Greenberg  
Marie-Ann Greenberg, Esquire  
Chapter 13 Standing Trustee